

MICHAEL J. MICELI, ESQ.
Nevada Bar No. 010151
PITARO & FUMO CHTD.
601 Las Vegas Blvd. South
Las Vegas, Nevada 89101
(702) 382-9221 Fax: (702) 474-4210
Email: michaeljmiceli@gmail.com
Attorney for Defendant
NAJEEB RAHMAN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NAJEEB RAHMAN,

Defendant.

Case No. 2:15-CR-00178-GMN-GWF

(5th Request)

**STIPULATION AND ORDER TO CONTINUE REVOCATION OF SUPERVISED
RELEASE HEARING**

IT IS HEREBY STIPULATED AND AGREED, by and between **TONY LOPEZ**, Assistant United States Attorney, counsel for the United States of America, and **MICHAEL J. MICELI, ESQ.**, counsel for **NAJEEB RAHAM**; that the revocation of supervised release currently scheduled for July 16, 2025, at 9:00 a.m., be continued to sixty (60) days or to a date and time convenient to the Court. In support of this Stipulation, the parties state as follows:

1. Among other things, the petition in this revocation proceeding alleges that defendant has committed new offenses, including wire fraud. A federal law enforcement

1 investigation into this allegation has obtained numerous documents and recordings, including
2 thousands of pages of bank records and hours of recorded phone calls and meetings.

3 2. The government anticipates that this proceeding may require a contested hearing
4 as to whether the defendant committed these new offenses and is providing fulsome discovery to
5 the defense.
6

7 3. Because of the nature of the investigation and the criminal history of the
8 defendant, the government needed to redact the personal identifying information and financial
9 account information from this voluminous discovery. The government anticipates being
10 substantially complete with its discovery production by Friday, July 11.
11

12 4. Defense counsel needs additional time to review this discovery and prepare for
13 the revocation hearing.

14 5. Defendant is not in custody and does not object to this request for continuance.

15 6. The government does not oppose continuance.

16 7. The parties do not anticipate requesting another continuance of the revocation
17 hearing.
18

19 8. Denial of this request for continuance could result in a miscarriage justice.

20 9. For all the above-stated reasons, the ends of justice would best be served by a
21 continuance of the Revocation Hearing until a date and time convenient to the Court but no
22 sooner than sixty (60) days.
23

24 10. This is the 5th request to continue the Revocation Hearing in this matter.

25 ///

26 ///

27 ///

1 **MICHAEL J. MICELI, ESQ.**

2 Nevada Bar No. 010151

3 **PITARO & FUMO CHTD.**

4 601 Las Vegas Blvd. South

5 Las Vegas, Nevada 89101

6 (702) 382-9221 Fax: (702) 474-4210

7 Email: michaeljmiceli@gmail.com

8 Attorney for Defendant

9 **NAJEEB RAHMAN**

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 **UNITED STATES OF AMERICA,**

13 Plaintiff,

14 vs.

15 **NAJEEB RAHMAN,**

16 Defendant.

Case No. 2:15-CR-00178-GMN-GWF

17 **ORDER**

18
19 **IT IS SO ORDERED** that the Revocation of Supervised Released Hearing currently set
20 for July 16, 2025 at 9:00 a.m., in Courtroom 7D be vacated and continue to 18th day of
21 September, 2025 at 9:00 a.m. in Courtroom 7D.

22
23 DATED this 11th day of July, 2025.

24 
25 **DISTRICT COURT JUDGE**